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**Via Electronic Mail**

October 31, 2019

Julie Woosley  
Chief, Hazardous Waste Section  
Division of Waste Management  
North Carolina Department of Environmental Quality  
1646 Mail Center  
217 West Jones Street  
Raleigh, NC 27603

Re: Monthly Implementation Update  
Lead Concentrate Removal and Reclamation Plan  
Immediate Action Notice of Violation, Docket # 2019-076  
American Zinc Products  
Mayes Warehouses, 660 Old Caroleen Road, Forest City, North Carolina

Dear Ms. Woosley:

On behalf of American Zinc Products LLC (“AZP”), and pursuant to Section 3.0 of the Lead Concentrate Removal and Reclamation Plan (the “Plan”) submitted with my letter to you of September 15, 2019, I am writing to provide a monthly update on implementation of the Plan. The Plan describes procedures for staging Lead Concentrate at the Mayes Warehouses (the “Warehouses”) located at 660 Old Caroleen Road in Forest City, North Carolina and arranging for its transportation to third-party reclamation facilities for recycling of the lead and other metal values.

**Management of Lead Concentrate at the Warehouses**

As described in Section 1.2 of the Plan, the Lead Concentrate temporarily staged at the Warehouses is contained in supersacks, which are placed on pallets with sufficient aisle space to allow for visual inspection. Pursuant to Section 2.1 of the Plan AZP has conducted weekly visual inspections of the supersacks in the Warehouses and addressed any observed damage to supersacks that could result in a release of material. Written documentation of the inspections is maintained at the AZP Mooresboro facility pursuant to Section 3.0 of the Plan.

**Shipments of Lead Concentrate for Off-site Reclamation**

Lead Concentrate removal from the Warehouses began on September 30, 2019. This update is based on information collected through October 24, 2019. The following table indicates the beginning inventory of Lead Concentrate, the total quantity of Lead Concentrate removed from

the Warehouses each week during this time period, and the quantity of Lead Concentrate remaining at the Warehouses at the end of this time period.

Week of	Tons	Supersacks	Container / Truck Loads
Beginning Inventory	6,347.10	3,201	329
09/30/2019	-417.98	-237	-20
10/7/2019	-412.94	-208	-20
10/14/2019	-705.74	-340	-35
10/21/2019	-1,377.58	-662	-65
Remainder	3,432.86	1,754	189

As described in prior correspondence with NCDEQ, supersacks of Lead Concentrate are being loaded into shipping containers and transported to two reclamation facility customers as follows:

- Supersacks are placed in containers and transported by truck to the inland Port of Greer, South Carolina, where the containers are transloaded into railcars and transported to the Port of Charleston, South Carolina. At the Port of Charleston, the containers are loaded onto a ship for transportation to the Port of Laem Chabang, Thailand. At that port, the containers will be transported by truck to the customer in Laos.
- Supersacks are placed in containers and transported by truck directly to the Port of Charleston, South Carolina. The containers are briefly staged at the Port of Charleston and then loaded onto a ship for transportation to the Port of Haiphong, Vietnam. At that port, the containers will be transported by truck to the customer in Hanoi, Vietnam.

Pursuant to Section 3.0 of the Plan, copies of shipping paperwork and certifications of reclamation (when received) are maintained at the AZP Mooresboro facility.

Please contact me if you have any questions or would like additional information.

Sincerely,



Timothy R. Basilone

cc: Mr. Jeff Menzel (via electronic mail)